

EXHIBIT 4

REDACTED

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Attorneys for Plaintiff
VERIGY US, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

VERIGY US, INC, a Delaware Corporation

Plaintiff,

vs.

ROMI OMAR MAYDER, an individual;
WESLEY MAYDER, an individual; SILICON
TEST SYSTEMS, INC., a California Corporation;
and SILICON TEST SOLUTIONS, LLC, a
California Limited Liability Corporation,
inclusive,

Defendants.

Case No.

**DECLARATION OF KEN HANH DUC
LAI IN SUPPORT OF PLAINTIFF'S
EX PARTE APPLICATION FOR
TEMPORARY RESTRAINING ORDER
TO SHOW CAUSE RE PRELIMINARY
INJUNCTION**

REDACTED VERSION OF

HIGHLY CONFIDENTIAL

ATTORNEYS EYES ONLY

DOCUMENT SUBMITTED UNDER SEAL

1 I, Ken Hanh Duc Lai, declare as follows:

2 1. I make this declaration of my personal knowledge and, if called as a witness, I
3 could and would testify competently to the facts set forth herein.

4 2. I am a product marketing manager in the memory test division at Plaintiff Verigy
5 US, Inc. (Verigy). Prior to the spin off of Verigy from its predecessor in interest, Agilent
6 Technologies Inc, in June 2006, I served as an applications manager at Agilent from November
7 1999. As the applications and product manager at Agilent and Verigy, I was responsible for
8 supporting our customers and the memory test division with applications related work. I worked
9 with Romi Omar Mayder ("Mayder") on the [REDACTED] project.

10 3. Attached hereto as Exhibit A is a true and correct copy of [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]

14 [REDACTED]. I consider this [REDACTED] to be a
15 confidential, proprietary and trade secret Verigy document that is the product of years of research
16 and experience. This document is never shared with any third parties. In fact, any information on
17 this spreadsheet that was compiled from third-party customers would likely be considered their
18 proprietary and confidential materials. Verigy and/or Agilent have signed non-disclosure
19 agreements with these third parties to ensure that information like this remains confidential.

20 4. Attached hereto as Exhibit B is a true and correct copy of [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED], and I created these documents
24 using [REDACTED].

25 5. Attached hereto as Exhibit C is a true and correct copy of [REDACTED]
26 [REDACTED]
27 [REDACTED]
28

1 [REDACTED] and I created these documents
2 using the [REDACTED].

3 6. Attached hereto as Exhibit D is a true and correct copy of [REDACTED]
4 [REDACTED]
5 resource extension for our client Toshiba. These visio documents are graphical renderings of the
6 [REDACTED], and I created these documents
7 using [REDACTED].

8 7. I consider all of the [REDACTED] attached as Exhibits B, C and D to be confidential,
9 proprietary and trade secret Verigy documents. These documents are never shared with any third
10 parties. [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED].

14 I declare under penalty of perjury under the laws of the United States that the foregoing is
15 true and correct.

16 Executed this 17th day of August, 2007 in Cupertino, California.

17
18 
19 Ken Hanh Duc Lai
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EXHIBIT A

EXHIBITS FILED UNDER SEAL

EXHIBIT B

EXHIBITS FILED UNDER SEAL

EXHIBIT C

EXHIBITS FILED UNDER SEAL

EXHIBIT D

EXHIBITS FILED UNDER SEAL